

EXHIBIT 78

Redacted Excerpts of Deposition of Jeffrey Aronson

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CUNG LE; NATHAN QUARRY, JON)	
FITCH, on behalf of)	
themselves and all others)	
similarly situated,)	
)	
Plaintiffs,)	
)	
vs.)	Case No.
)	2:15-cv-01045-RFB-(PAL)
)	
ZUFFA, LLC, d/b/a Ultimate)	
Fighting Championship and)	
UFC,)	
)	
Defendant.)	
_____)	

April 25, 2017
10:34 a.m.

Videotaped deposition of JEFFREY
ARONSON, pursuant to notice and subpoena,
at the offices of Cohen Milstein Sellers
& Toll, PLLC, 2925 PGA Boulevard, Palm
Beach Gardens, Florida, before Jack Finz,
a Shorthand Reporter and Notary Public
within and for the State of Florida.

Job No. 50118

<p style="text-align: right;">22</p> <p>1 JEFFREY ARONSON</p> <p>2 feel free to ask questions about</p> <p>3 these four. Just that it's not a</p> <p>4 complete article.</p> <p>5 Q. Does this article refresh your</p> <p>6 recollection that you gave an interview</p> <p>7 with Bloody Elbow on December 31, 2014,</p> <p>8 or around then?</p> <p>9 A. Not really. I do a ton of</p> <p>10 interviews. But I see it.</p> <p>11 Q. Can you please read the</p> <p>12 paragraph starting at the top of the page</p> <p>13 that's Bates stamped 963 to the end? It</p> <p>14 begins with "Just 11 months ago."</p> <p>15 A. "Just 11 months ago, Titan was</p> <p>16 an obscure, regional promotion that</p> <p>17 wasn't signing fighters and had no TV</p> <p>18 deal. Today we're mentioned up there</p> <p>19 with the top three or four promotions.</p> <p>20 Are we three? Are we four? I don't</p> <p>21 know. Are we making leaps and bounds in</p> <p>22 the right direction? 100 percent. We're</p> <p>23 diligently working to continue moving</p> <p>24 forward."</p> <p>25 Q. Is that an accurate quote from</p>	<p style="text-align: right;">24</p> <p>1 JEFFREY ARONSON</p> <p>2 the public eye, secure a television deal,</p> <p>3 and move forward, and give fighters an</p> <p>4 opportunity to get fights under a solid</p> <p>5 platform.</p> <p>6 Q. Do you recall giving an</p> <p>7 interview with Iain Kidd of Bloody Elbow</p> <p>8 on or around February 24, 2014?</p> <p>9 A. No.</p> <p>10 (Aronson Exhibit 6 for</p> <p>11 identification, transcript of</p> <p>12 interview with Iain Kidd on</p> <p>13 February 24, 2014.)</p> <p>14 Q. I am handing you what has been</p> <p>15 marked Aronson Exhibit 6. This is a</p> <p>16 public article we printed off the</p> <p>17 Internet. Let me give you a chance to</p> <p>18 take a look through it.</p> <p>19 A. Okay.</p> <p>20 Q. Does this article refresh your</p> <p>21 recollection that you gave an interview</p> <p>22 with Iain Kidd of Bloody Elbow on or</p> <p>23 around February 24, 2014?</p> <p>24 A. Not really.</p> <p>25 Q. As far as you recall, does</p>
<p style="text-align: right;">23</p> <p>1 JEFFREY ARONSON</p> <p>2 you in this interview, as far as you</p> <p>3 recall?</p> <p>4 A. I think so.</p> <p>5 Q. Do you still believe that when</p> <p>6 you acquired Titan at the end of 2013</p> <p>7 that it was an obscure regional promotion</p> <p>8 and wasn't signing fighters and/or a TV</p> <p>9 deal?</p> <p>10 A. Yes.</p> <p>11 Q. What are the other top three</p> <p>12 or four promotions that you were</p> <p>13 referring to?</p> <p>14 MS. DENNIS: Objection to</p> <p>15 form.</p> <p>16 MR. SCHULZ: Go ahead.</p> <p>17 A. UFC, Bellator, World Series of</p> <p>18 Fighting, and probably One FC.</p> <p>19 Q. When you purchased a</p> <p>20 controlling stake in Titan, what were</p> <p>21 your plans for the promotion?</p> <p>22 A. My plans were to get the</p> <p>23 promotion back into the public eye. It</p> <p>24 had been suffering financially for a</p> <p>25 while. So I wanted to get it back into</p>	<p style="text-align: right;">25</p> <p>1 JEFFREY ARONSON</p> <p>2 this article accurately quote you?</p> <p>3 MS. DENNIS: Objection to</p> <p>4 form.</p> <p>5 A. I don't know. I don't</p> <p>6 remember the interview.</p> <p>7 Q. If you start at the bottom of</p> <p>8 page 2, the article purports to quote</p> <p>9 you, around halfway down page 2.</p> <p>10 Do you see that?</p> <p>11 A. "When I started Alchemist,"</p> <p>12 that part?</p> <p>13 Q. Yes. Can you read that quote?</p> <p>14 A. "When I started Alchemist in</p> <p>15 2010," I think the year is wrong, by the</p> <p>16 way, "with Lex McMahon, MC Hammer and</p> <p>17 Nima Safapour, the goal was to create the</p> <p>18 best management company in MMA, to</p> <p>19 cultivate the top prospects and to get</p> <p>20 them into UFC, to find the best veterans</p> <p>21 and start running their careers</p> <p>22 professionally and get them involved with</p> <p>23 mainstream sponsors and things outside of</p> <p>24 the cage. We wanted to plant the seeds</p> <p>25 today that will blossom into things for</p>

<p style="text-align: right;">26</p> <p>1 JEFFREY ARONSON</p> <p>2 their retirement."</p> <p>3 Q. Can you read the rest of the</p> <p>4 quote?</p> <p>5 A. Sure. "We have done</p> <p>6 exceptionally well with that, but the</p> <p>7 problem I started running into as I</p> <p>8 started signing more and more top young</p> <p>9 prospects, was I couldn't get them any</p> <p>10 fights. No one would fight these guys.</p> <p>11 So you've got these incredible 2-0, 3-0</p> <p>12 prospects, but you can't get them any</p> <p>13 fights! The problem is the UFC is</p> <p>14 typically not looking for a kid who is</p> <p>15 2-0 or 3-0, so they have to fight. It</p> <p>16 has become an epidemic. I started</p> <p>17 talking to other managers in the field</p> <p>18 and everybody has the same problems."</p> <p>19 Q. Can you read the last</p> <p>20 paragraph, too?</p> <p>21 A. "I decided about a year ago</p> <p>22 that I had had enough. I was looking</p> <p>23 around at different promotions and seeing</p> <p>24 what was going on in the business of MMA.</p> <p>25 I got myself familiar with some of the</p>	<p style="text-align: right;">28</p> <p>1 JEFFREY ARONSON</p> <p>2 MS. DENNIS: Objection to</p> <p>3 form.</p> <p>4 A. Because they were incredibly</p> <p>5 talented, and fighters at the same level</p> <p>6 with one or two fights didn't want to</p> <p>7 risk losing and getting a loss on their</p> <p>8 record so early.</p> <p>9 Q. Do you still believe that the</p> <p>10 UFC is typically or was at the time</p> <p>11 typically not looking for a kid who is</p> <p>12 2-0 and 3-0?</p> <p>13 MS. DENNIS: Objection to</p> <p>14 form.</p> <p>15 A. Yes.</p> <p>16 Q. Was it your perception at the</p> <p>17 time that the UFC already had more</p> <p>18 fighters signed than they could use?</p> <p>19 A. No.</p> <p>20 Q. Why was the UFC typically not</p> <p>21 looking for a kid who was 2-0 or 3-0?</p> <p>22 MS. DENNIS: Objection to</p> <p>23 form.</p> <p>24 A. Very early in development.</p> <p>25 Q. So the UFC is looking for a</p>
<p style="text-align: right;">27</p> <p>1 JEFFREY ARONSON</p> <p>2 promoters out there, and then I started a</p> <p>3 new company called Titan FC and I brought</p> <p>4 over a bunch of guys that had run the</p> <p>5 shows for the old Titan, because there's</p> <p>6 so much that goes into putting on a good</p> <p>7 show."</p> <p>8 Q. Other than the first sentence</p> <p>9 that says you started Alchemist in 2010,</p> <p>10 is there anything else in there that is</p> <p>11 incorrect?</p> <p>12 A. No.</p> <p>13 Q. Does this quote accurately</p> <p>14 explain what made you decide to start</p> <p>15 promoting in MMA?</p> <p>16 MS. DENNIS: Objection to</p> <p>17 form.</p> <p>18 A. Some. I mean, there's a lot</p> <p>19 that went into it.</p> <p>20 Q. Do you disagree with anything</p> <p>21 in this quote?</p> <p>22 A. No.</p> <p>23 Q. Why do you think there were</p> <p>24 incredible prospects who weren't getting</p> <p>25 any fights?</p>	<p style="text-align: right;">29</p> <p>1 JEFFREY ARONSON</p> <p>2 longer record, generally, as far as you</p> <p>3 are aware?</p> <p>4 MS. DENNIS: Objection to</p> <p>5 form, foundation.</p> <p>6 A. I'm not aware. I just know</p> <p>7 that it is just very early in a</p> <p>8 prospect's career, and to put them on a</p> <p>9 stage like that would be crazy.</p> <p>10 Q. Can you read the next part of</p> <p>11 that page?</p> <p>12 A. Where would you like?</p> <p>13 Q. Starting "I pride myself."</p> <p>14 A. "I pride myself on my business</p> <p>15 acumen, and the one thing I really do is</p> <p>16 study what's going on in the industry and</p> <p>17 the field. History repeats itself, so</p> <p>18 look at everybody that's going up against</p> <p>19 the UFC, Bodog, Elite XC, Strikeforce...</p> <p>20 Everybody that has tried to challenge UFC</p> <p>21 has wound up on their butt. Nobody has</p> <p>22 been able to do it."</p> <p>23 Q. Does that quote accurately</p> <p>24 explain your view of the MMA market?</p> <p>25 MS. DENNIS: Objection to</p>

<p style="text-align: right;">38</p> <p>1 JEFFREY ARONSON</p> <p>2 translates into the cage, so everybody</p> <p>3 deserves a second chance.</p> <p>4 Q. Are those vets trying to get</p> <p>5 back into the UFC, in you experience?</p> <p>6 A. I think they are trying to get</p> <p>7 their careers on a positive flow. That's</p> <p>8 the most important thing to these guys.</p> <p>9 Q. With the fights that Titan FC</p> <p>10 puts on, are you trying to compete</p> <p>11 directly with the UFC?</p> <p>12 MS. DENNIS: Objection to</p> <p>13 form.</p> <p>14 A. You asked me this numerous</p> <p>15 times, and my answer is not going to</p> <p>16 change.</p> <p>17 Q. Can you give your answer one</p> <p>18 more time for me?</p> <p>19 MS. DENNIS: Objection to</p> <p>20 form; asked and answered.</p> <p>21 A. No.</p> <p>22 Q. If the UFC offers a Titan FC</p> <p>23 fighter a contract, do you ever bid</p> <p>24 against the UFC for that contract?</p> <p>25 MS. DENNIS: I object to form.</p>	<p style="text-align: right;">40</p> <p>1 JEFFREY ARONSON</p> <p>2 how could I bid against the UFC? I am</p> <p>3 offering the fighter an opportunity to go</p> <p>4 to UFC, so how could I bid against them?</p> <p>5 Q. If you turn to page 4 of this</p> <p>6 interview. Can you read the paragraph in</p> <p>7 the middle of the page that begins with</p> <p>8 "No one is the going to tell me."</p> <p>9 A. "No one is going to tell me</p> <p>10 that the best talent in the world is not</p> <p>11 at that UFC level. A guy might have a</p> <p>12 little bit of a rough patch in the UFC</p> <p>13 but the year before he might have been</p> <p>14 ready to fight for the title. Look at</p> <p>15 somebody like George Sotiropolous who we</p> <p>16 just signed. He went through a rough</p> <p>17 patch, but a year before that he was one</p> <p>18 fight away from the lightweight title."</p> <p>19 Q. In early 2014, do you think</p> <p>20 that the best talent in the world was at</p> <p>21 the UFC level?</p> <p>22 A. Not necessarily. Bellator</p> <p>23 certainly had fighters on par with UFC.</p> <p>24 Strikeforce had fighters on par with UFC.</p> <p>25 I think those have all been established</p>
<p style="text-align: right;">39</p> <p>1 JEFFREY ARONSON</p> <p>2 A. How could I bid if it's in my</p> <p>3 contract that they have an automatic out?</p> <p>4 Q. So you can't bid under your</p> <p>5 contract?</p> <p>6 MS. DENNIS: I object to form.</p> <p>7 A. They have an automatic</p> <p>8 release. It's a Zuffa Out clause.</p> <p>9 Q. Can you explain how that works</p> <p>10 then?</p> <p>11 A. If Zuffa comes calling within</p> <p>12 X amount of time before a Titan event,</p> <p>13 then the fighter is free to go and fight</p> <p>14 for Zuffa.</p> <p>15 Q. So under that contract you</p> <p>16 can't offer the fighter more money to</p> <p>17 keep them?</p> <p>18 MS. DENNIS: Form.</p> <p>19 A. A fighter could say no. A</p> <p>20 fighter could say no if they wanted to</p> <p>21 stay with Titan, certainly. But why</p> <p>22 would I bid against myself?</p> <p>23 Q. What I am asking is would you</p> <p>24 bid against the UFC.</p> <p>25 A. If I have a Zuffa Out clause,</p>	<p style="text-align: right;">41</p> <p>1 JEFFREY ARONSON</p> <p>2 and they have become champions in the</p> <p>3 UFC.</p> <p>4 Q. Strikeforce at the time was</p> <p>5 controlled by Zuffa; is that right?</p> <p>6 A. No, I don't think in 2014. I</p> <p>7 don't know. I don't know the date.</p> <p>8 Q. Did Titan FC sometimes promote</p> <p>9 fights between two different UFC</p> <p>10 veterans?</p> <p>11 A. Probably.</p> <p>12 Q. Do you recall whether Titan FC</p> <p>13 29 was a fight between Mike Ritchey and</p> <p>14 George Sotiropolous?</p> <p>15 A. Yes.</p> <p>16 Q. Do you know if they were UFC</p> <p>17 veterans?</p> <p>18 A. Yes. We have also put on UFC</p> <p>19 verse Bellator, Bellator verse Prospect.</p> <p>20 I mean, it's back and forth, back and</p> <p>21 forth.</p> <p>22 Q. Were all of the UFC vets who</p> <p>23 were acquired by Titan FC fighters who</p> <p>24 UFC had released?</p> <p>25 MS. DENNIS: Objection to</p>

<p style="text-align: right;">50</p> <p>1 JEFFREY ARONSON</p> <p>2 relationship with the UFC, Titan's</p> <p>3 relationship?</p> <p>4 MS. DENNIS: Objection to</p> <p>5 form.</p> <p>6 A. I think it's fine. I mean,</p> <p>7 it's okay. It's good.</p> <p>8 Q. Since you took over at Titan,</p> <p>9 do you know about how many Titan fighters</p> <p>10 have gone on to the UFC?</p> <p>11 A. An exact list?</p> <p>12 Q. No, just a rough number.</p> <p>13 A. That actually fought for Titan</p> <p>14 or were signed to Titan or --</p> <p>15 Q. That were signed to Titan.</p> <p>16 A. I don't. I'm sorry.</p> <p>17 Q. In this article it says -- it</p> <p>18 quotes you as saying "Since I took over</p> <p>19 Titan," and this article was August 22,</p> <p>20 2014, "I would say a minimum of ten</p> <p>21 fighters have gone to the UFC."</p> <p>22 Does that number sound</p> <p>23 inaccurate to you?</p> <p>24 MS. DENNIS: The entire quote</p> <p>25 actually goes on to say "and we're</p>	<p style="text-align: right;">52</p> <p>1 JEFFREY ARONSON</p> <p>2 form.</p> <p>3 A. If anything, we knew who were</p> <p>4 the parties involved there. But did it</p> <p>5 add anything? I don't know. We had a</p> <p>6 good working relationship with them at</p> <p>7 Alchemist and we have a good working</p> <p>8 relationship with them today.</p> <p>9 Q. If you look at the next page,</p> <p>10 page 3, the top of page 3.</p> <p>11 A. Yes.</p> <p>12 Q. The interviewer is asking</p> <p>13 about talent exchange.</p> <p>14 A. Yes.</p> <p>15 Q. Do you know what the article</p> <p>16 is referring to when it says talent</p> <p>17 exchange?</p> <p>18 A. You know, there was a big push</p> <p>19 a few years ago for different promotions</p> <p>20 to challenge each other and put guys</p> <p>21 against it. None of it ever came to</p> <p>22 fruition. I think my position on this</p> <p>23 was that my athletes, I felt, were of the</p> <p>24 top level in the world and there was no</p> <p>25 promotion I wouldn't put my guys up</p>
<p style="text-align: right;">51</p> <p>1 JEFFREY ARONSON</p> <p>2 not missing a beat," just for the</p> <p>3 record.</p> <p>4 A. Can you tell me where it is?</p> <p>5 Q. Yes, it's on page 2.</p> <p>6 A. I mean, at that point I'm</p> <p>7 assuming that that's what the number was.</p> <p>8 Q. At the top of that quote it</p> <p>9 says "I think we have an excellent</p> <p>10 relationship with the UFC." Would you</p> <p>11 disagree with that characterization?</p> <p>12 A. No. I think we have a good</p> <p>13 relationship with UFC.</p> <p>14 Q. Did the long-term work you did</p> <p>15 at Alchemist help you with your personal</p> <p>16 relationship with UFC?</p> <p>17 MS. DENNIS: Objection to</p> <p>18 form.</p> <p>19 A. I personally have never</p> <p>20 negotiated a deal with UFC in my life.</p> <p>21 So...</p> <p>22 Q. Do you disagree that your work</p> <p>23 at Alchemist helps you in your</p> <p>24 relationship with UFC?</p> <p>25 MS. DENNIS: Objection to</p>	<p style="text-align: right;">53</p> <p>1 JEFFREY ARONSON</p> <p>2 against.</p> <p>3 Q. When you say put your guys up</p> <p>4 against, do you mean co-promote an event</p> <p>5 against a fighter from another promotion?</p> <p>6 A. No, have a fighter from</p> <p>7 another promotion come to Titan and</p> <p>8 fight. I don't think that would be a</p> <p>9 co-promotion.</p> <p>10 Q. The second sentence here says</p> <p>11 "I think we are going to see cross-</p> <p>12 promotion superfights at some point."</p> <p>13 A. Um-hum.</p> <p>14 Q. Do you know what</p> <p>15 cross-promotion superfights referred to?</p> <p>16 A. That's exactly what I was just</p> <p>17 talking to, where one guy would come over</p> <p>18 from one promotion and fight another.</p> <p>19 But that doesn't mean a co-promoted</p> <p>20 event. It's just you are taking two</p> <p>21 stars and putting them in onto one mat.</p> <p>22 It also says right underneath</p> <p>23 that I say I see talent exchanges</p> <p>24 happening, and I think we are going to</p> <p>25 see like-minded individuals from a</p>

<p style="text-align: right;">74</p> <p>1 JEFFREY ARONSON</p> <p>2 with Bellator. I've dealt with other</p> <p>3 promotions when I was with Alchemist. I</p> <p>4 know who the key players are. And I</p> <p>5 found UFC to be the best promotion in the</p> <p>6 world to deal with. So that's an honest</p> <p>7 statement.</p> <p>8 Q. Did you have a good</p> <p>9 relationship with the UFC at the time you</p> <p>10 gave this interview, which was, I</p> <p>11 believe, in March of 2016?</p> <p>12 A. I've always -- I told you, we</p> <p>13 have always had a good relationship with</p> <p>14 UFC. I mean, it's never been anything</p> <p>15 different.</p> <p>16 (A video was played, as</p> <p>17 follows:</p> <p>18 "MR. McGRATH: Why does this</p> <p>19 guy this want to fight in the</p> <p>20 championships? What is your</p> <p>21 personal goal for the organization?</p> <p>22 MR. ARONSON: To continue to</p> <p>23 increase the opportunity for</p> <p>24 certain fighters, to increase the</p> <p>25 eyeballs, so increase the amount of</p>	<p style="text-align: right;">76</p> <p>1 JEFFREY ARONSON</p> <p>2 my job well.")</p> <p>3 Q. So in that interview in</p> <p>4 March -- strike that.</p> <p>5 Do you think that in March of</p> <p>6 2016 it was the goal of all MMA fighters</p> <p>7 to fight in the UFC, if they could get</p> <p>8 there?</p> <p>9 MS. DENNIS: Objection to</p> <p>10 form.</p> <p>11 A. I do. I think UFC is the best</p> <p>12 promotion in the United States. I think</p> <p>13 it has plenty of competitors, but I think</p> <p>14 that they are far and above the best</p> <p>15 promotion in the United States. Or in</p> <p>16 the world. I believe that.</p> <p>17 Q. Do you think it is the goal of</p> <p>18 all MMA fighters to fight in UFC today,</p> <p>19 if they can get there?</p> <p>20 MS. DENNIS: Objection to</p> <p>21 form.</p> <p>22 A. I do. I would want to.</p> <p>23 Q. Can you describe what</p> <p>24 cross-promotion is to me, as you</p> <p>25 understand the term?</p>
<p style="text-align: right;">75</p> <p>1 JEFFREY ARONSON</p> <p>2 shows, and to constantly do better</p> <p>3 than the show before. I really</p> <p>4 think it's important not to look at</p> <p>5 anyone else as a competitor. I</p> <p>6 mean, to me my only competitor is</p> <p>7 myself. So I want that every Titan</p> <p>8 show to be better than the last</p> <p>9 Titan show. I want the fighters to</p> <p>10 put on the best fights. I want</p> <p>11 them to have the best opportunity.</p> <p>12 And if I could help facilitate some</p> <p>13 of my fighters getting to fulfill</p> <p>14 their dream, because, let's face</p> <p>15 it, you go into every gym in the</p> <p>16 world and you ask the guys in an</p> <p>17 MMA gym what is your goal in life?</p> <p>18 UFC champion. Right? Come on. We</p> <p>19 could all kid ourselves, we could</p> <p>20 all say it's this promotion, that</p> <p>21 promotion. It's not. It's UFC.</p> <p>22 That's the top of the mountain. So</p> <p>23 if I could be a facilitator and I</p> <p>24 can be somebody that can help these</p> <p>25 guys get to that point, I've done</p>	<p style="text-align: right;">77</p> <p>1 JEFFREY ARONSON</p> <p>2 A. We went through that.</p> <p>3 Q. I think we covered that.</p> <p>4 You're right.</p> <p>5 MR. SILVERMAN: Why don't we</p> <p>6 take a little break.</p> <p>7 THE VIDEOGRAPHER: We are</p> <p>8 going off the record at 12:18.</p> <p>9 (A recess was taken.)</p> <p>10 THE VIDEOGRAPHER: Here begins</p> <p>11 Media Unit No. 2 in the continued</p> <p>12 deposition of Jeff Aronson. We are</p> <p>13 back on the record at 12:29 p.m.</p> <p>14 (Aronson Exhibit 11 for</p> <p>15 identification, transcript of</p> <p>16 interview by Duane Finley on June</p> <p>17 15, 2015.)</p> <p>18 BY MR. SILVERMAN:</p> <p>19 Q. I am handing you what has been</p> <p>20 marked as Aronson Exhibit 11.</p> <p>21 Let me know when you have had</p> <p>22 a chance to read it.</p> <p>23 A. Okay.</p> <p>24 Q. Have you seen this article</p> <p>25 before?</p>

<p style="text-align: right;">78</p> <p>1 JEFFREY ARONSON</p> <p>2 A. I don't remember it.</p> <p>3 Q. Do you remember giving an</p> <p>4 interview to Duane Finley around June 15,</p> <p>5 2015?</p> <p>6 A. Not particularly.</p> <p>7 Q. We were talking earlier about</p> <p>8 Fight Pass; right?</p> <p>9 A. Um-hum.</p> <p>10 Q. When did Titan and Zuffa enter</p> <p>11 into a deal to have Titan show up on</p> <p>12 Fight Pass?</p> <p>13 A. I'm not sure of the date. I</p> <p>14 think I said it here somewhere.</p> <p>15 I'm really not sure. I think</p> <p>16 it was 2015.</p> <p>17 Q. Why did Titan enter into a</p> <p>18 deal with Zuffa to broadcast Titan shows</p> <p>19 on Fight Pass?</p> <p>20 A. The international exposure.</p> <p>21 Fight Pass is positioning itself kind of</p> <p>22 as the Netflix of fights. And it was a</p> <p>23 great way to establish more publicity on</p> <p>24 the Titan events by getting a push by the</p> <p>25 CPO machine.</p>	<p style="text-align: right;">80</p> <p>1 JEFFREY ARONSON</p> <p>2 was the 20th promotion to have their</p> <p>3 fights catalogued under the UFC banner.</p> <p>4 Do you know if that's accurate?</p> <p>5 A. No.</p> <p>6 Q. No, you don't know?</p> <p>7 A. I think the definition of</p> <p>8 catalog is that they showed the old</p> <p>9 fights, not that they were live streaming</p> <p>10 events on the network.</p> <p>11 Q. And did Fight Pass put the</p> <p>12 live Titan events on the network?</p> <p>13 A. Yes.</p> <p>14 Q. You can put that one aside.</p> <p>15 Were you involved at all in</p> <p>16 the negotiations between Zuffa and Titan</p> <p>17 regarding the Fight Pass deal?</p> <p>18 A. No.</p> <p>19 Q. Who was involved in those</p> <p>20 negotiations?</p> <p>21 A. I was in the background,</p> <p>22 dealing with Lex McMahon, and Lex was</p> <p>23 negotiating with UFC.</p> <p>24 Q. Did you discuss those</p> <p>25 negotiations with Mr. McMahon?</p>
<p style="text-align: right;">79</p> <p>1 JEFFREY ARONSON</p> <p>2 Q. Does Fight Pass help pay net</p> <p>3 fee fighters game exposure?</p> <p>4 A. Sure. I think that any time</p> <p>5 you are on a network that's being</p> <p>6 distributed, you have all eyes on you.</p> <p>7 So anything that's going on, you know,</p> <p>8 when they see a hot prospect, or there's</p> <p>9 someone that they really like, they keep</p> <p>10 a close watch on him. But they did that</p> <p>11 at CBS, too.</p> <p>12 Q. At the time Titan had a deal</p> <p>13 to have events broadcast on CBS; is that</p> <p>14 right?</p> <p>15 A. Yes.</p> <p>16 Q. Were there any advantages to</p> <p>17 Titan to be broadcast on Fight Pass above</p> <p>18 and beyond being broadcast on CBS?</p> <p>19 MS. DENNIS: Objection to</p> <p>20 form.</p> <p>21 A. Yes.</p> <p>22 Q. What were they?</p> <p>23 A. Promotion in over 150</p> <p>24 countries, through UFC's PR machine.</p> <p>25 Q. The article says that Titan FC</p>	<p style="text-align: right;">81</p> <p>1 JEFFREY ARONSON</p> <p>2 A. Yes.</p> <p>3 Q. Did you have final approval</p> <p>4 over the terms of the deal with Zuffa?</p> <p>5 A. Yes.</p> <p>6 Q. Are you familiar with the</p> <p>7 terms of the deal?</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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<p>1</p> <p>2 STATE OF _____)</p> <p>3) :ss</p> <p>4 COUNTY OF _____)</p> <p>5</p> <p>6</p> <p>7 I, JEFFREY ARONSON, the witness</p> <p>8 herein, having read the foregoing</p> <p>9 testimony of the pages of this deposition,</p> <p>10 do hereby certify it to be a true and</p> <p>11 correct transcript, subject to the</p> <p>12 corrections, if any, shown on the attached</p> <p>13 page.</p> <p>14</p> <p>15 _____</p> <p>16 JEFFREY ARONSON</p> <p>17</p> <p>18</p> <p>19</p> <p>20 Sworn and subscribed to before</p> <p>21 me, this _____ day of</p> <p>22 _____, 2017.</p> <p>23</p> <p>24 _____</p> <p>25 Notary Public</p>	<p>1 INSTRUCTIONS TO WITNESS</p> <p>2</p> <p>3 Please read your deposition over carefully</p> <p>4 and make any necessary corrections. You should state</p> <p>5 the reason in the appropriate space on the errata</p> <p>6 sheet for any corrections that are made.</p> <p>7 After doing so, please sign the errata sheet</p> <p>8 and date it.</p> <p>9 You are signing same subject to the changes</p> <p>10 you have noted on the errata sheet, which will be</p> <p>11 attached to your deposition.</p> <p>12 It is imperative that you return the original</p> <p>13 errata sheet to the deposing attorney within thirty</p> <p>14 (30) days of receipt of the deposition transcript by</p> <p>15 you. If you fail to do so, the deposition transcript</p> <p>16 may be deemed to be accurate and may be used in court.</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
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<p>1</p> <p>2 C E R T I F I C A T E</p> <p>3 STATE OF FLORIDA)</p> <p>4 : ss.</p> <p>5 COUNTY OF PALM BEACH)</p> <p>6 I, JACK FINZ, a Shorthand</p> <p>7 Reporter and Notary Public within and</p> <p>8 for the State of Florida, do hereby</p> <p>9 certify:</p> <p>10 That JEFFREY ARONSON, the</p> <p>11 witness whose deposition is</p> <p>12 hereinbefore set forth, was duly sworn</p> <p>13 by me and that such deposition is a</p> <p>14 true record of the testimony given by</p> <p>15 the witness.</p> <p>16 I further certify that I am</p> <p>17 not related to any of the parties to</p> <p>18 this action by blood or marriage, and</p> <p>19 that I am in no way interested in the</p> <p>20 outcome of this matter.</p> <p>21 IN WITNESS WHEREOF, I have</p> <p>22 hereunto set my hand this 4th day of</p> <p>23 May, 2017.</p> <p>24 _____</p> <p>25 JACK FINZ</p>	<p>1 E R R A T A</p> <p>2</p> <p>3</p> <p>4</p> <p>5 I wish to make the following changes,</p> <p>6 for the following reasons:</p> <p>7</p> <p>8 PAGE LINE</p> <p>9 _____ CHANGE: _____</p> <p>10 REASON: _____</p> <p>11 _____ CHANGE: _____</p> <p>12 REASON: _____</p> <p>13 _____ CHANGE: _____</p> <p>14 REASON: _____</p> <p>15 _____ CHANGE: _____</p> <p>16 REASON: _____</p> <p>17 _____ CHANGE: _____</p> <p>18 REASON: _____</p> <p>19 _____ CHANGE: _____</p> <p>20 REASON: _____</p> <p>21</p> <p>22</p> <p>23 _____ WITNESS' SIGNATURE _____ DATE</p> <p>24</p> <p>25</p>